

US Court DNH
FILED - USDC - NH
2022 MAY 16 PM 12:01

Woodham v. NH (state) 20-cv-537-SE
Woodham v. NH ~~DS~~ 20-cv-236-SM

Motion for preliminary Injunction (pls expedite) (unless the contacts I'm to be on permanent lockdown)

I am a resident at the SPU. I have been diagnosed with severe AD+ID and have been taking medication for several years now. The psychiatrists at SPU have refused to medicate me for the past six months. I am struggling to attend to my court obligations and so have been requesting Continuances.

② The statute I was committed under requires I not be placed in segregation, except with my consent, or in emergency situations, RSA 135-C. I've been in segregation since February 2022. There is no emergency, rather I'm being punished for being too drowsy and/or dizzy to stand for head count at 8am, prior to taking the medication to treat these issues.

Relief: Please order the State, commissioner of corrections, forensic director of SPU to treat me for ADHD. Since this presents an access to court issue, I am protected under the 1st Amendment, & refusal to treat me will result in irreparable harm. The issue is also time-sensitive and I have no other recourse to address the issue as complaining to administrators has got me nowhere.

③ Order the SPU & other defendants to release me from segregation. The Statute 135-C gives me a clear liberty interest in avoiding unnecessary confinement, and the caselaw on patients is ^{also} clear! we are not to be punished as a convict might be, King v. Greenberg (D Mass, some 20yrs of litigation)

④ Any other relief this court sees just. Obviously, I am likely to succeed on the merits and it's difficult to understand why the SPU would resist my reasonable date requests.

I swear under penalty of perjury the foregoing is true to the best of my knowledge. Since I am obv. not dangerous.
Dated 5/11/22 by W. Grace Woodham in proper, Concord, NH.

Grace Woodham
SPU #139265
218 N. State St
Concord NH 03302

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Clerk of Court
US District Court
55 Pleasant St
Concord NH 03301

*"Mailed from the NH State Prison. Contents have not
been evaluated. Not Responsible for content/substance."*

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